

New York State Green Procurement Program
Response to Comments

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Proposed Specification on Heating and Cooling Specification (Heat Pumps)

Background:

Commenting Entities: Sierra Club (Atlantic Chapter), Clean and Healthy NY, New York League of Conservation Voters, WEACTION, Environmental Advocates NY, Green Inside and Out, Inc.

Comment: We support the take-back/recycling specification for replacement of equipment, regardless of manufacturer, to avoid improper disposal of equipment which can lead to heavy metals seeping into groundwater.

Response: This seems to be an affirmation of already existing, positive content in the draft spec.

Recommendation: No edits requested or needed.

Commenter: Tom Konrad, Ph.D, CFA (he/him), Chair, [Marbletown Environmental Conservation Commission](#) (Town of Marbletown, NY), Editor, [AltEnergyStocks.com](#) and [Home Energy Coach](#)

Comment: I recently read your Tentative Specification for Heating and Cooling Equipment (<https://ogs.ny.gov/system/files/documents/2022/04/heating-and-cooling-equipment-heat-pumps.pdf>) with interest. The specifications reference the best industry standards that I am aware of.

Unfortunately, the specifications fail to address electrification. These purchasing guidelines for NY government entities should not only specify efficient equipment of the types covered, but also indicate that HVAC equipment which uses fossil fuels should not be purchased where there is a viable electrified alternative.

In short, the guidelines should prohibit the purchase of the following types of equipment except in cases where there is no suitable electrified alternative:

- HVAC equipment which uses natural gas, propane, fuel oil or other fossil fuels
- Water heating equipment other than heat pump water heaters
- Heat pump equipment without heating capability (i.e., conventional air conditioners)

Response: The State is currently looking to move toward cleaner technologies that are not operated by fossil fuels and transition to energy-efficient electric technologies, wherever feasible, with the intention of phasing in requirements that in time result in healthy, comfortable, and zero greenhouse gas emission buildings. Providing an encouragement rather than a requirement at this time provides time to transition.

Recommendation: The bullets Mr. Konrad provided have been incorporated into the document in the form of an encouragement.